

UNITED STATES DISTRICT COURT
for the

Eastern District of Michigan

United States of America

v.

Tylique Quayshawn Campbell

Case: 2:21-mj-30496

Assigned To : Unassigned

Assign. Date : 10/21/2021

Case No. Description: U.S. V. CAMPBELL
(CMP)(MEV)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September 3, 2021 in the county of Oakland in the
Eastern District of Michigan, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 922(g)(1)	Felon in Possession of a Firearm

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT

Continued on the attached sheet.



Complainant's signature

Special Agent Kenton Weston, ATF
Printed name and title

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: October 21, 2021

City and state: Detroit, Michigan



Judge's signature

Hon. Kimberly G. Altman, U.S. Magistrate Judge
Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Kenton Weston, being first duly sworn, hereby state:

I. INTRODUCTION

1. I have been employed as a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) since January 2018. I am currently assigned to the Detroit Field Division, Crime Gun Enforcement Team (CGET). I am tasked with investigating violations of federal firearms laws. I have been involved in dozens of investigations involving violations of federal firearms laws, which have resulted in the seizure of hundreds of firearms. In addition, I have graduated from the Federal Law Enforcement Training Center and ATF Special Agent Basic Training.

2. This affidavit is made in support of an application for a criminal complaint for Tylique Quayshawn CAMPBELL (DOB xx/xx/2001). Probable cause exists that CAMPBELL, knowing he had been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm that traveled in interstate commerce, in violation of 18 U.S.C. § 922(g)(1).

3. I make this affidavit based on my participation in this investigation, witness interviews conducted by myself and other law enforcement agents, reports from other law enforcement agents, communications with others who have personal knowledge of the events and circumstances described herein, and

information gained through my training and experience.

4. The information in this affidavit is for the limited purpose of establishing probable cause and does not include all the information known to law enforcement about this investigation.

5. On September 4, 2021, a shooting occurred outside of the Elam Brothers Restaurant in the City of Pontiac. The investigation resulted in the recovery of three firearms. Further investigation revealed that, on September 3, 2021, CAMPBELL possessed one of the weapons recovered from the shooting during the filming of a rap video in the same location.

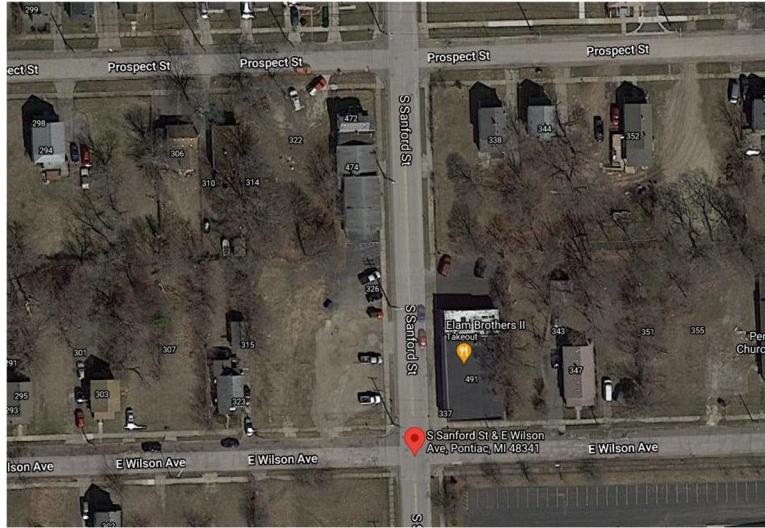
II. PROBABLE CAUSE

A. September 4, 2021, shooting outside of Elam Brothers Restaurant.

6. The following is a summary of Oakland County Sheriff Office (OCSO) report number 21-183574 and a surveillance video obtained from the Elam Brothers Restaurant located at the northeast corner of Sanford Street and East Wilson Avenue, Pontiac, Eastern District of Michigan.

7. On September 4, 2021, at approximately 5:53 p.m., Oakland County Sheriff's Deputies were dispatched to a report of shots fired in the area of South Sandford Street and East Wilson Avenue in Pontiac, Eastern District of Michigan. Deputies recovered 9mm and .40 caliber fired cartridge cases from the scene. See map in Image 1 below.

Image 1



8. Deputies arrived and observed a tan Chevrolet Silverado parked in a parking lot at the intersection. The Silverado had gunshot damage to the rear of the vehicle and passenger window. Officers interviewed the owner of the vehicle. The owner reported he worked across the street at the Elam Brothers Restaurant. He observed several younger black males shooting near his vehicle before running north.

9. Deputies also spoke to several witnesses attending a party at a nearby residence. The witnesses heard shots being fired on Wilson Avenue and then observed approximately six males running west on Prospect Street, the next street north of East Wilson Avenue and the Elam Brothers Restaurant. The witnesses reported that one of the individuals appeared to have a gunshot wound to his foot. Also, several of those running had firearms in their hands. Deputies also spoke to the occupants of another nearby residence. After the shooting, they observed a

bullet hole in a window of their child's bedroom. The child was home but was not injured.

10. Deputies conducted a property check at 323 East Wilson Avenue, a house approximately 115 feet from the shooting. While deputies were in the area of the detached garage of 323 East Wilson, they heard a noise coming from inside the garage. Immediately thereafter, CAMPBELL exited the garage. CAMPBELL was detained in handcuffs. CAMPBELL refused to identify himself and a deputy, who previously had contact with CAMPBELL, verified his identity.

11. Deputies continued a search of the backyard. They observed Jeremiah Williams standing in the bushes and leaning against a fence in the northeast section of the property associated with 323 Wilson Avenue. Approximately twenty feet from where Williams was standing, another deputy located a black Nike backpack in the northeast corner of the yard.

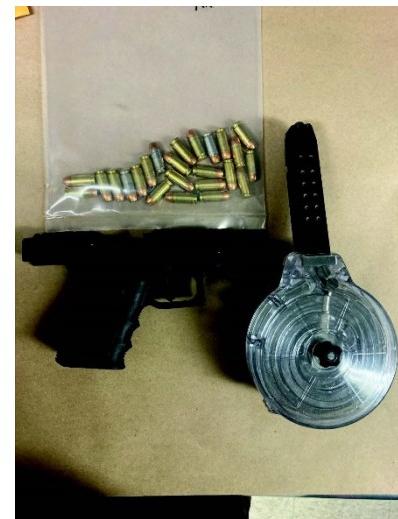
12. Inside the Nike backpack, deputies located three firearms: (1) one black Glock 23 .40 caliber pistol bearing serial number "BSRE291" with one round in the chamber and an inserted extended magazine with three rounds (hereinafter "the subject firearm"); (2) one black Glock 23 .40 caliber pistol bearing serial number "BUCV267" with one round in the chamber and twenty-three rounds in the "drum" magazine inserted in the firearm (hereinafter "firearm 2"); and (3) one Masterpiece Arms MAP 30T 9mm bearing serial number

“FX25924” with no round in the chamber and an empty extended magazine inserted in the firearm (hereinafter “firearm 3”). See Image 2 (the subject firearm) and Image 3 (firearm 2).

Image 2



Image 3



13. Deputies also observed and detained Zyshonne Ratliff, whom they knew based on previous contact, walking in the parking lot north of where the shooting occurred.

14. A review of surveillance video from the Elam Brothers Restaurant showed Williams, Ratliff, and CAMPBELL, walk into the Elam Brothers Restaurant at approximately 5:30 p.m. Williams wore the black Nike backpack. CAMPBELL wore light-colored ripped blue jeans, a Looney Toons Florida Gators sweatshirt, and white shoes. See Images 4 and 5 below.

Image 4



Image 5



15. Deputies interviewed an individual who was inside the Elam Brothers Restaurant when the shooting started. This individual reported that three younger black males, all of whom seemed nervous, walked inside the restaurant. They stayed for a short item then exited without ordering. The individual observed these same individuals shooting in the parking lot.

16. In another surveillance image, CAMPBELL stood near a trash can holding a cell phone in his right hand. Deputies who reviewed the video observed the outline of an object consistent with a pistol in CAMPBELL's front right pocket (circled in red below). See Image 6 below.

Image 6



17. At approximately 5:31 p.m., a subject wearing all black Adidas pants enters the restaurant and stands next to CAMPBELL. Immediately thereafter, Williams, Ratliff, CAMPBELL, and the subject wearing the black Adidas pants exited the restaurant.

18. At approximately 5:33 p.m., the surveillance camera showed the clerk working at the counter inside the restaurant visibly react to something outside. The clerk walked over and closed the front door of the restaurant.

B. CAMPBELL's possession of the subject firearm.

19. On September 8, 2021, four days after the shooting, a video entitled "72 Tcee- keep it 300" was uploaded to YouTube. I reviewed the video. The video, was recorded just outside of the Elam Brothers Restaurant. CAMPBELL is wearing the same Looney Tunes Florida Gators sweatshirt, in the video, that he wore on September 4, 2021, the day of the shooting. Williams is wearing the same

black Nike backpack observed in Image 5 above (internal surveillance camera at Elam Brothers Restaurant).

20. The video starts with an image of an E. Wilson street sign above a stop sign. There is an E. Wilson street sign above a stop sign at the intersection of E. Wilson and Sanford, where the aforementioned shooting took place. On the YouTube video, CAMPBELL walks into the Elam Brothers Restaurant with Williams who is wearing the same black Nike backpack from which the deputies recovered the three firearms on September 4. See Image 7 below.

Image 7



21. On the rap video, CAMPBELL brandishes a black compact Glock pistol with an extended magazine. See Image 8 below. This appears to be the same gun recovered from the Nike backpack on the day of the shooting (see paragraph 13). CAMPBELL is standing on E. Wilson, west of Sanford Street. The southern half of the Elam Brothers Restaurant and a portion of the parking lot across from

the restaurant are visible in the left side of Image 8. In other portions of the video, the Elam Brothers Restaurant is totally visible.

Image 8



22. In another part of the video, the black firearm in Williams's possession (Williams is wearing the white t-shirt) appears to be firearm 2, the same black Glock with a drum magazine recovered from his black Nike backpack identified in paragraph 13. See Image 9 below.

Image 9



23. An individual interviewed at the scene of the shooting indicated that Williams, CAMPBELL, Ratliff, and others were shooting a rap video the day before the shooting, on September 3, 2021.

24. In a social media post dated September 3, 2021, CAMPBELL is holding a black firearm, that appears to be the subject firearm, a Glock with an extended magazine. He is pointing the firearm at the camera. See Image 10 below. He is wearing the same Florida Gators Loony Toons sweatshirt and jeans.

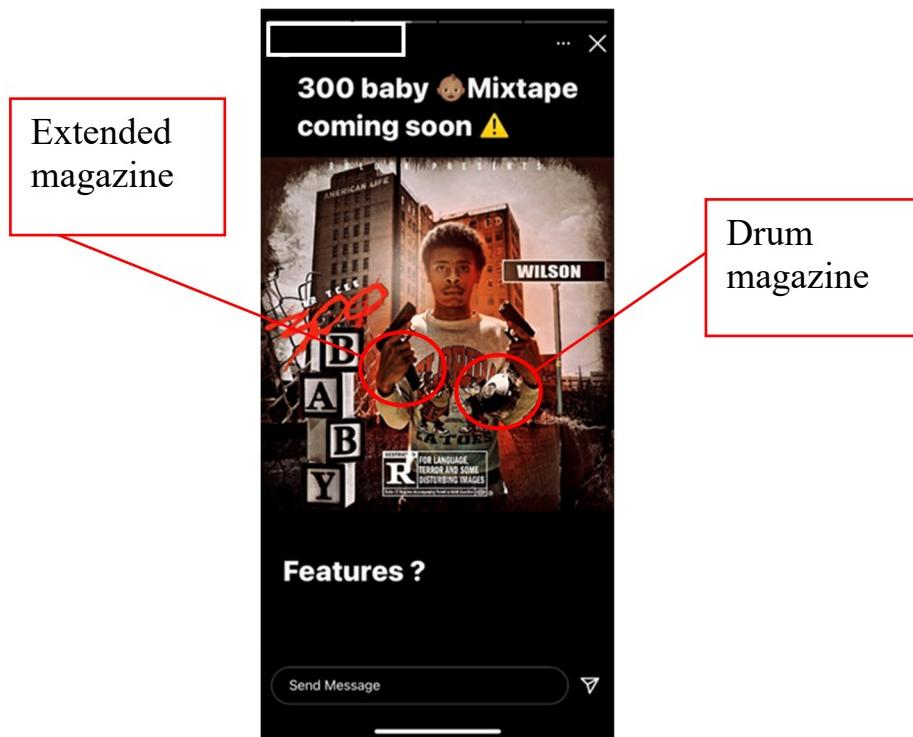
Image 10



25. On September 16, 2021, a social media account that appears to be associated with CAMPBELL posted an image of CAMPBELL wearing the Looney Tunes Florida Gators sweatshirt brandishing two compact Glock model firearms,

one with an extended magazine (the subject firearm) the other with a drum magazine (firearm 2). See Image 11 below.

Image 11



26. In summary, CAMPBELL and others recorded a rap video on September 3, 2021, in Pontiac. The firearms, recovered from the September 4, 2021, shooting investigation, were the firearms CAMPBELL possessed in the rap video and other social media posts.

C. CAMPBELL's criminal history and interstate nexus.

27. I reviewed CAMPBELL's criminal history. On May 23, 2019, CAMPBELL pleaded guilty in the Sixth Judicial Circuit, Oakland County, State of

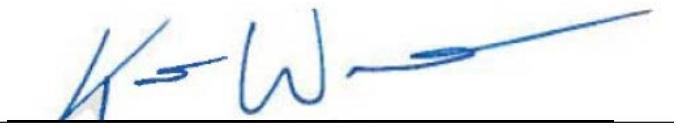
Michigan, to felony false report or threat of bomb / harmful device. CAMPBELL is currently on felony probation with the Michigan Department of Corrections.

28. On October 18, 2021, I contacted Special Agent Michael Jacobs, an ATF Interstate Nexus Expert, and gave him a verbal description of the firearms recovered from the backpack. Based upon the verbal description, Special Agent Jacobs advised that the firearms qualified as firearms as defined under 18 U.S.C. § 921 and were manufactured outside of the state of Michigan after 1898. Therefore, the weapons traveled in and affected interstate commerce.

III. CONCLUSION

29. Probable cause exists that, on or about September 3 and/or September 4, 2021, Tylique Quayshawn CAMPBELL, knowing he was a convicted felon, knowing possessed a firearm that traveled through interstate and/or foreign commerce, in violation of 18 U.S.C. § 922(g)(1).

Respectfully submitted,



Kenton Weston, Special Agent
Bureau of Alcohol, Tobacco,
Firearms and Explosives

Subscribed to and sworn before me or by reliable electronic means
on this 21st day of October 2021.



HON. KIMBERLY ALTMAN
UNITED STATES MAGISTRATE JUDGE

Dated: October 21, 2021